

9-30-2005

7802 SE 76th St.
Mercer Island, WA 98040

Federal Communications Commission
Washington, D.C.

Re: WT Docket no. 05-235

Dear Staff:

I am strongly opposed to elimination of the Morse code/CW requirement for U.S. amateur radio licensees—particularly Extra-class operators. I also feel strongly that the minimum CW speed requirement for Extras should be around 15 wpm.

I recognize that this docket reflects a current Worldwide trend. However, I perceive that trend to be baselessly biased and, I'm sorry to say, lemming-like.

Two key trends that are relevant today and for the foreseeable future are these:

1. The decreasing relative inability of amateurs to field strong signals due both to CCRs and the demographic reality of small urban lots restricting the installation of effective high-frequency-band (HF) antennas; and
2. The keen interest in low-power (QRP) operations.

Both of these trends augur for *increased* use of CW, not the inverse.

CW also seems to be a very *popular* mode (second only to single-sideband voice--SSB?), which makes the codeless proposal particularly and perversely backwards.

Mine is a case in point: during half or more of the solar cycle, running 700 watts output power to a trapped vertical antenna, I cannot usually be heard by the long-distance short-wave stations (DX) I wish to contact unless I am on CW—SSB just doesn't cut it. And with this typical small-lot antenna, QRP doesn't work, either.

In summary: please maintain a 5-wpm requirement for the lower license classes and a 15-wpm capability for Extra class. Also, please retain the lower 25 kHz of each band for Extras.

Thank you,

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